

# United States District Court

FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

**FILED**

**AUG 22 2024**

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

V.

ESBIN RAMIREZ-GARCIA,

**CR 24 0477**

**WHA**

DEFENDANT(S).

## INDICTMENT

18 U.S.C. § 2241(a) – Aggravated Sexual Abuse  
18 U.S.C. § 2253 and 28 U.S.C. § 2461 – Forfeiture Allegation

A true bill.

/s/ Foreperson of the Grand Jury

Foreman

Filed in open court this 22nd day of

August, 2024

Clerk

Bail, \$ No Process

U.S. Magistrate Judge Kandis A. Westmore

*Kandis Westmore* 8/22/2024

ISMAIL J. RAMSEY (CABN 189820)  
United States Attorney

ORIGINAL

FILED

AUG 22 2024

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ESBIN RAMIREZ-GARCIA,

Defendant.

CASE NO.

CR 24 0477

WHA

VIOLATION:

18 U.S.C. § 2241(a) – Aggravated Sexual Abuse

18 U.S.C. § 2253 and 28 U.S.C. § 2461 –

Forfeiture Allegation

SAN FRANCISCO VENUE

INDICTMENT

The Grand Jury charges:

COUNT ONE: (18 U.S.C. § 2241(a) – Aggravated Sexual Abuse)

On or about August 2, 2024, and August 3, 2024, in the Northern District of California and within the boundaries of the Golden Gate National Recreation Area, an area within the special maritime and territorial jurisdiction of the United States as defined in 18 U.S.C. § 7(3), the defendant,

ESBIN RAMIREZ-GARCIA,

did knowingly use force to cause Victim to engage in a sexual act, to wit, the penetration, however slight, of the anal or genital opening of another by a hand or finger or by any object, with an intent to abuse, humiliate, harass, degrade, or arouse or gratify the sexual desire of any person, in violation of Title 18, United States Code, Section 2241(a).

INDICTMENT

1 FORFEITURE ALLEGATION: (18 U.S.C. § 2253 and 28 U.S.C. § 2461)

2 The allegations contained in this Indictment are re-alleged and incorporated by reference for the  
3 purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253 and Title 28,  
4 United States Code, Section 2461.

5 Upon conviction of Count One in this Indictment, the defendant,  
6  
7 shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253 and Title 28,  
8 United States Code, Section 2461(c), all property, real or personal, used or intended to be used to  
9 commit or to promote the commission of such offense or any property traceable to such property,  
10 including a forfeiture money judgment and a metallic green Chevrolet Silverado with California license  
11 plate 36584D3 and VIN 3GCEC13J28G277389.

12 If any of the property described above, as a result of any act or omission of the defendant:

- 13 a. cannot be located upon exercise of due diligence;
- 14 b. has been transferred or sold to, or deposited with, a third party;
- 15 c. has been placed beyond the jurisdiction of the court;
- 16 d. has been substantially diminished in value; or
- 17 e. has been commingled with other property which cannot be divided without  
18 difficulty,

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1 the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 18,  
2 United States Code, Section 2253, as incorporated by Title 28, United States Code, Section 2461(c).

3 All pursuant to Title 18, United States Code, Section 2253, Title 28, United States Code, Section  
4 2461(c), and Federal Rule of Criminal Procedure 32.2.

5  
6 DATED: August 22, 2024

A TRUE BILL.

7  
8 /s/ Foreperson  
9 FOREPERSON  
Oakland, California

10 ISMAIL J. RAMSEY  
11 United States Attorney

12  
13 /s/ Christine Chen  
14 CHRISTINE CHEN  
Special Assistant United States Attorney